

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAMON MODESTO
Plaintiff,

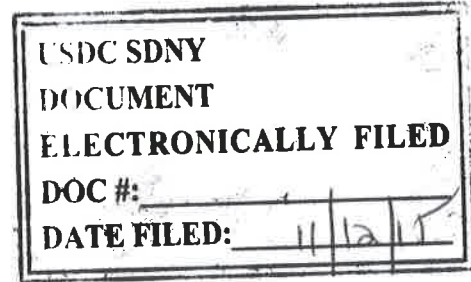
15-CV-00495 (KNF)(RA)

NOTICE OF MOTION

-against-

HECTOR FIGUEROA , et. al.
Defendants,

X-----X



PLEASE TAKE NOTICE that upon the annexed affirmation of Ramon Modesto, affirmed on November 9, 2015, plaintiff will move this Court, before Kevin Nathaniel Fox, United States Magistrate Judge, for an order pursuant to the Federal Rules on Civil Procedure granting the plaintiff's motion for extension of time to file Opposition to Defendants Peter St. John and Christian Gonzales' Motion to Dismiss filed on October 22, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 9, 2015
Woodside, New York

Ramon Modesto
Ramon Modesto
4029 67 St. 2F
Woodside, NY 11377
718-431-5226

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X-----X

RAMON MODESTO
Plaintiff,

-against-

15-cv-00495 (KNF)(RA)
AFFIRMATION IN SUPPORT
OF MOTION FOR EXTENSION
OF TIME TO FILE OPPOSITION
TO MOTION TO DISMISS

HECTOR FIGUEROA, et.al.
Defendants,

X-----X

I, Ramon Modesto, affirm under penalty of perjury that:

1. I am the plaintiff in the instant case, and respectfully move this Court to issue an order granting plaintiff more time to file an opposition to defendants Peter St. John and Christian Gonzales' filed motion to dismiss this case.
2. The reason why I am entitled to the relief I seek is that the Hon. Magistrate Judge made a Report and Recommendation on November 2, 2015 recommending the dismissal of the complaints against three (3) other groups of defendants in this case.
3. Plaintiff was given only a period of 14 days to file his opposition to the said Report and Recommendation, and plaintiff needs more time to file his objections thereto in the period specified. For the meantime he respectfully requests the Court allow him more time to file his opposition to the motion

to dismiss filed by the two above named defendants employees of Trinity Real Estate.

WHEREFORE, I respectfully request that the court grant this motion, as well as other reliefs and remedies just and equitable under the premises.

Dated: Woodside, New York
November 9, 2015

Ramon Modesto
Ramon Modesto
4029 67 st. 2F
Woodside, NY 11377
Cel. No. 718-431-5226

